

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

No. 3:24-cr- 00479-AN-1

v.

INFORMATION

JAKOB JOSHUA STICKNEY,
Defendant.

18 U.S.C. § 2422(b)
18 U.S.C. § 2251(a)
18 U.S.C. § 2252A(a)(5)(B) and (b)(1)

Forfeiture Allegation

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1
(Coercion and Enticement of a Minor)
(18 U.S.C. § 2422(b))

Beginning on or about September 5, 2023, and continuing to on or about September 9, 2023, in the District of Oregon and elsewhere, defendant **JAKOB JOSHUA STICKNEY** did use any facility of interstate and foreign commerce, that is a computer connected to the internet, to knowingly persuade, induce, entice, and coerce an individual, Minor Victim 1 (MV1), who had not attained the age of 18 years to engage in any sexual activity for which any person could be charged with a criminal offense, specifically Rape in the first degree, in violation of ORS 163.375;

In violation of Title 18, United States Code, Section 2422(b).

COUNT 2
(Sexual Exploitation of Children)
(18 U.S.C. § 2251(a))

On or about August 25, 2023, in the District of Oregon and elsewhere, defendant **JAKOB JOSHUA STICKNEY** knowingly employed, used, persuaded, induced, enticed, and coerced Minor Victims 2 and 3 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing or having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or that such visual depiction was actually transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or that it was produced using materials that had been mailed, shipped, or transported across state lines or in foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a).

COUNT 3
(Sexual Exploitation of Children)
(18 U.S.C. § 2251(a))

On or about September 7, 2023, in the District of Oregon and elsewhere, defendants **JAKOB JOSHUA STICKNEY** knowingly employed, used, persuaded, induced, enticed, and coerced Minor Victim 4 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct or transmitting a live visual depiction of such conduct, knowing or having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or that such visual depiction was actually transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or

that it was produced using materials that had been mailed, shipped or transported across state lines or in foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a).

COUNT 4
(Sexual Exploitation of Children)
(18 U.S.C. § 2251(a))

On or about September 5, 2023, in the District of Oregon and elsewhere, defendants **JAKOB JOSHUA STICKNEY** knowingly employed, used, persuaded, induced, enticed, and coerced Minor Victim 5 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct or transmitting a live visual depiction of such conduct, knowing or having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or that such visual depiction was actually transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or that it was produced using materials that had been mailed, shipped or transported across state lines or in foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a).

COUNT 5
(Possession of Child Pornography)
(18 U.S.C. § 2252A(a)(5)(B) and (b)(1))

On or about November 15, 2023, in the District of Oregon, defendant **JAKOB JOSHUA STICKNEY**, knowingly and unlawfully possessed material containing child pornography that had been shipped or transported using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce by any means, including by computer, or that was

produced using materials that had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(1).

FIRST CRIMINAL FORFEITURE ALLEGATION

Pursuant to Title 18, United States Code, Section 2428, upon conviction of the offense in Count 1 of this information, defendant **JAKOB JOSHUA STICKNEY** shall forfeit to the United States any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation, and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violation.

SECOND CRIMINAL FORFEITURE ALLEGATION

Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense described above in Count 2 of this information, defendant **JAKOB JOSHUA STICKNEY** shall forfeit to the United States any and all matter that contains visual depictions of minors engaging in sexually explicit conduct that were produced, possessed, transported, mailed, shipped, or received in violation thereof, and any and all property that was used or was intended to be used in any manner or part to commit or promote the commission of the aforementioned violations.

DATED: December 30, 2024.

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Eliza Carmen Rodriguez
ELIZA CARMEN RODRIGUEZ
Assistant United States Attorney